

**ORIGINAL**

OPEN MEETING AGENDA ITEM



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1 Timothy M. Hogan (004567)  
2 ARIZONA CENTER FOR LAW  
3 IN THE PUBLIC INTEREST  
4 202 E. McDowell Rd., Suite 153  
5 Phoenix, Arizona 85004  
6 (602) 258-8850

Arizona Corporation Commission

**DOCKETED**

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7 Attorneys for Southwest Energy  
8 Efficiency Project

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**BEFORE THE ARIZONA CORPORATION COMMISSION**

9 BOB STUMP, Chairman  
10 GARY PIERCE  
11 BRENDA BURNS  
12 BOB BURNS  
13 SUSAN BITTER SMITH

14 IN THE MATTER OF ARIZONA PUBLIC  
15 SERVICE COMPANY'S RESOURCE PLAN  
16 APPLICATION

Docket No. E-00000A-11-0113

**SWEEP EXCEPTIONS TO  
STAFF'S RECOMMENDED  
OPINION AND ORDER, STAFF  
PROPOSED AMENDMENT NO. 1**

17 The Southwest Energy Efficiency Project ("SWEEP") submits these exceptions to Staff's  
18 Recommended Opinion and Order ("ROO") regarding the 2012 Integrated Resource Plans  
19 ("IRPs"). Specifically, SWEEP submits exceptions to Staff Proposed Amendment No. 1, which  
20 Staff filed in its Supplement to the Staff Report for Resource Planning and Procurement for 2011  
21 and 2012, dated March 21, 2013. SWEEP offers these exceptions in the spirit of important  
22 clarifications, and SWEEP has discussed its proposed exceptions and clarifications with Staff.

23 See Attachment A included herein, which shows three versions of the proposed language  
24 for the new ordering paragraph in Staff Proposed Amendment No. 1:

- 25 1. Staff's proposed language for the new ordering paragraph.

1 2. SWEEP's proposed exceptions and clarifications shown in redline/strikethrough.

2 3. A clean version with SWEEP's proposed revisions incorporated.

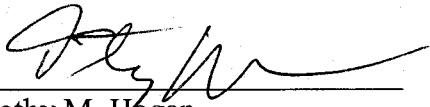
3 These changes and clarifications to the new ordering paragraph in Staff Proposed  
4 Amendment No. 1 are important for three reasons:

- 5 1. Generally there are several scenarios presented in the resource plans, and SWEEP  
6 supports the development and presentation of several scenarios. Therefore, this additional  
7 scenario to analyze the impacts of delaying capacity additions if the load-serving entity is  
8 faced with possible extra capacity would simply be one more scenario, and it would not  
9 really be an "alternate" scenario. SWEEP suggests naming this additional scenario the  
10 "delay capacity additions" scenario.  
11 2. The load-serving entities should present several scenarios in the resource plans, as noted  
12 above. Therefore, any comparisons should be to all of the other scenarios presented in the  
13 load-serving entity's resource plan (i.e., a complete comparison across all scenarios) and  
14 not just a comparison to one scenario.  
15 3. The comparison of the "delay capacity additions" scenario to the other scenarios in the  
16 resource plan should include a comparison of projected retail rates and total customer  
17 costs (and not just retail rates). Total customer costs are analyzed in the resource plans.

18 DATED this 26<sup>th</sup> day of April, 2013.

19 ARIZONA CENTER FOR LAW IN  
20 THE PUBLIC INTEREST

21 By

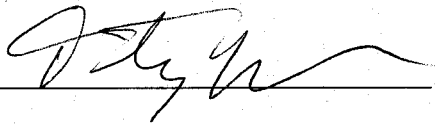
22   
23 Timothy M. Hogan  
24 202 E. McDowell Rd., Suite 153  
25 Phoenix, Arizona 85004  
Attorneys for Southwest Energy Efficiency  
Project

26 ORIGINAL and 13 COPIES of  
27 the foregoing filed this 26<sup>th</sup> day  
28 of April, 2013 with:

29 Docket Control  
30 Arizona Corporation Commission  
31 1200 W. Washington  
32 Phoenix, AZ 85007

COPIES of the foregoing  
Electronically mailed this  
26<sup>th</sup> day of April, 2013, to:

All Parties of Record

A handwritten signature in black ink, appearing to read "J. Tyler", is written over a horizontal line.

1 **Attachment A**

2 SWEEP Written Exceptions to Staff Proposed Amendment No. 1  
3 In the Supplement to Staff Report dated March 21, 2013

4 Page 8, Line 4

4 INSERT NEW PARAGRAPH:

5 Staff Proposed Amendment No. 1:

6 "IT IS FURTHER ORDERED that, in all future Integrated Resource Plans filed with the  
7 Commission, each load-serving entity with possible extra capacity shall include an alternative  
8 scenario in which any additions of capacity, mandated or not, that contribute to the possible extra  
9 capacity are delayed until such additions do not contribute to the possible extra capacity. Each  
10 load-serving entity's IRP shall also include a comparison of all projected costs under this  
11 alternative scenario relative to the load-serving entity's preferred plan, including a comparison of  
12 projected retail rates."

10 SWEEP proposed revision (changes shown in redline/strikethrough):

11 "IT IS FURTHER ORDERED that, in all future Integrated Resource Plans filed with the  
12 Commission, each load-serving entity with possible extra capacity shall include ~~an alternative~~  
13 scenario in which any additions of capacity, mandated or not, that contribute to the possible extra  
14 capacity are delayed until such additions do not contribute to the possible extra capacity. Each  
15 load-serving entity's IRP shall also include a comparison of all projected costs under ~~theis~~ "delay  
16 capacity additions" alternative scenario relative to the load-serving entity's preferred plan and  
17 other resource scenarios in the plan, including a comparison of projected retail rates and total  
18 customer costs."

16 SWEEP proposed revision (redline/strikethrough accepted):

17 "IT IS FURTHER ORDERED that, in all future Integrated Resource Plans filed with the  
18 Commission, each load-serving entity with possible extra capacity shall include a scenario in  
19 which any additions of capacity, mandated or not, that contribute to the possible extra capacity  
20 are delayed until such additions do not contribute to the possible extra capacity. Each load-  
21 serving entity's IRP shall also include a comparison of all projected costs under the "delay  
22 capacity additions" scenario relative to the load-serving entity's preferred plan and other  
23 resource scenarios in the plan, including a comparison of projected retail rates and total customer  
24 costs."

22 MAKE ALL CONFORMING CHANGES